

EXHIBIT J

CONFIDENTIAL

Page 1

1 CONFIDENTIAL

1

2 IN THE UNITED STATES DISTRICT COURT

3 SOUTHERN DISTRICT OF OHIO

4 EASTERN DIVISION

5 * * *

6 EDISON BREWING COMPANY, LLC,

7 Plaintiff,

8 VS

Case No.

9 GOURMET FRESH, LLC,

10 Defendant.

11 * * *

12 Deposition of LISA SULLIVAN,

13 Witness herein, called by the Plaintiff for

14 cross-examination pursuant to the Rules of

17 Civil Procedure, taken before me, Donald

19 Correll, a Notary Public in and for the State

21 of Ohio, at Standley Law Group, LLP, on

23 Tuesday, the 2nd day of December 2021, at

25 9:27 a.m.

CONFIDENTIAL

Page 68

1 contracted for outside wedding planning
2 services.

3 Q. Does Izaya essentially function as
4 a wedding planner?

5 A. She handles all of the planning
6 related to the venue and all of our services.
7 She wouldn't, for example, assist with an
8 off-site ceremony or helping them with a
9 photographer contract, for example. But
10 everything related to what we provide, yes.

11 Q. You said that all-inclusive is
12 used differently in the industry than you use
13 it?

14 A. Yes.

15 Q. So starting with what you
16 understand about the industry, what is the
17 industry definition of all-inclusive?

18 A. Industry standard is generally use
19 of the space. The food and beverage is
20 typically done in-house. Any of your basic
21 needs to execute an event are included, such as
22 tables, chairs. Usually it's black or white
23 linens. Silverware. That type of thing. All
24 the minimals you need to execute an event. We
25 do all of that, plus several other things.

CONFIDENTIAL

Page 69

1 Q. And that is your definition of
2 Gourmet Fresh, Edison777 all-inclusive? That
3 plus the other things?

4 A. Yes.

5 Q. So what are the other things?

6 A. We handle all of the DJ services
7 for your on-site ceremony and reception. We
8 handle all of the floral needs. So if you need
9 center pieces, bouquets, boutonnieres. We do
10 the wedding cake, as well. We offer 80
11 different linen colors and napkin colors, as
12 opposed to black or white. We have additional
13 things that you can rent through us, such as
14 chargers and votives and other decor
15 enhancements. We have a photo booth. We offer
16 valet. I'm sure there's others. Those are the
17 big points.

18 Q. So the DJ services. Those are
19 provided by -- is it D&M DJ Services?

20 A. Yes.

21 Q. And they are not in the Gourmet
22 Fresh, LLC, correct?

23 A. Correct.

24 Q. So they're kind of a preferred
25 vendor?

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Page 78

1 within my first few weeks, I basically spent
2 that time creating and finalizing our wedding
3 packages, our pricing, all of that. So on
4 December 8th, when that was finalized, I sent
5 it out to everyone who would initially inquire
6 prior to that and basically said I don't have
7 all my final information yet. Stay tuned.
8 I'll send it to you when I get it. And so
9 sometime on or about December 8th would have
10 been when these clients in particular received
11 that wedding packet from me.

12 Q. Would you recall if it had been a
13 referral?

14 A. It wasn't.

15 Q. Did they do any type of tour
16 before booking?

17 A. Sort of.

18 Q. What kind of tour did they do
19 before booking?

20 A. Prior to the venue, prior to the
21 building being up and running, I was meeting
22 with prospective clients at The FIG Room.
23 Which is less than half a mile away. So they
24 would have met with me at The FIG Room. I had
25 renderings, other information for them to kind

CONFIDENTIAL

Page 79

1 of meet with me in person and chat through the
2 day with them.

3 Q. These renderings, how were they
4 presented?

5 A. Big foam core. I had poster
6 boards. I think I had six of them at the time.

7 Q. So like two-dimensional printouts?

8 A. Two-dimensional printouts, yes.

9 Q. And what was depicted on those
10 print outs?

11 A. I believe there were two different
12 views of the street exterior of the building.
13 There was a courtyard rendering. There were
14 two interior renderings, and then there were
15 one or two floor plan, sample floor plan,
16 mockups. So there were, yeah, six or seven
17 posters.

18 Q. So the exterior views were the
19 front facade in the courtyard?

20 A. The exterior views were the front
21 facade and then another angle of the front, and
22 then the courtyard was a third.

23 Q. And then the interior views, what
24 did those depict?

25 A. There was a view as if you were

CONFIDENTIAL

Page 94

1 Q. And those are done every six
2 months?

3 A. Roughly.

4 Q. So the next one would be early
5 June?

6 A. Well, no. Our next one is in
7 January, because we changed the schedule. It
8 will be January, and then July is our next one
9 after that.

10 Q. How many couples attended last
11 night?

12 A. 29 weddings.

13 Q. And how many have you got
14 scheduled for January so far?

15 A. I think it's bigger than that. So
16 I think it's somewhere in the mid 30s.

17 Q. Does anyone other than the couples
18 attend those?

19 A. Yes.

20 Q. Is it typically parents?

21 A. They're welcome to bring two
22 complimentary guests to the first look events.
23 It's generally parents, and then they can pay
24 for two additional guests to attend.

25 Q. Can you run me through what a

CONFIDENTIAL

Page 95

1 first event looks like?

2 A. Yeah. It's the client's
3 opportunity to see the space fully decorated,
4 try our most popular entrees, try the most
5 popular cake flavors and fillings, see a
6 variety of linen samples, see a ton of floral
7 ideas, different inspiration there.

8 It's just a fun night out for them
9 to experience the venue similarly to how it
10 might be on their wedding day. The DJ is there
11 playing music. The bar is open. The photo
12 booth is running. It's just kind of a nice
13 night out for them to get ideas and try things.

14 Q. Besides private tours and the
15 first look hosted last night, have there been
16 any other events at 777 North 4th Street
17 showcasing the venue, introducing it to
18 clients?

19 A. Yes. In sometime over the summer
20 we hosted a vendor open house. That was by
21 invite only, but we invited various wedding
22 vendors in the city to see the space.

23 We also held a client open house
24 for our already-booked clients who had booked
25 with me, again, prior to the venue being open.

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Page 112

1 IN WITNESS WHEREOF, I have hereunto set
2 my hand and seal of office at Dayton, Ohio, on
3 this 12th day of December 2021.

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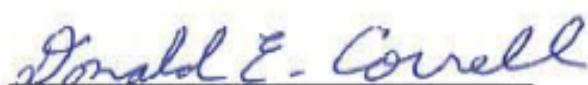
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DONALD CORRELL

NOTARY PUBLIC, STATE OF OHIO

My commission expires 8-9-2022

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CONFIDENTIAL

Page 114

1 DEPOSITION REVIEW
2 CERTIFICATION OF WITNESS

3 ASSIGNMENT REFERENCE NO: 4962968

4 CASE NAME: Edison Brewing Company, LLC v. Gourmet Fresh, Llc

5 DATE OF DEPOSITION: 12/2/2021

6 WITNESS' NAME: Lisa Sullivan

7 In accordance with the Rules of Civil
8 Procedure, I have read the entire transcript of
9 my testimony or it has been read to me.

10 I have made no changes to the testimony
11 as transcribed by the court reporter.

12 02/04/2022

13 Date 
Lisa Sullivan

14 Sworn to and subscribed before me, a
15 Notary Public in and for the State and County,
16 the referenced witness did personally appear
17 and acknowledge that:

18 They have read the transcript;
19 They signed the foregoing Sworn
20 Statement; and
21 Their execution of this Statement is of
22 their free act and deed.

23 I have affixed my name and official seal
24 this _____ day of _____, 20_____.
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26 Notary Public
27 _____

28 Commission Expiration Date
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